

JUL 19 2012

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
ASHLEY C. DRUMMOND, and)
SUSAN L. HARRIS,)
)
Defendants.)

CRIMINAL NO. 12-30226-6pm

Title 18,
United States Code,
Section 1349, 1028A

INDICTMENT

THE GRAND JURY CHARGES:

Count 1

Conspiracy to Commit Mail Fraud

1. From on or about November 14, 2011 through on or about December 5, 2011, in Madison County and St. Clair County, Illinois, within the Southern District of Illinois and elsewhere,

ASHLEY C. DRUMMOND and

SUSAN L. HARRIS,

defendants herein, did knowingly and intentionally conspire with each other and with other persons, known and unknown to the Grand Jury to commit an offense against the United States, namely Mail Fraud in violation of Title 18, United States Code, Section 1341.

Purpose

2. The purpose of the conspiracy was for the defendants to profit by using the personal identifying information of persons other than themselves to open credit accounts and use the credit accounts for their own benefit.

Manner and Means

3. At all times relevant to this indictment, **ASHLEY C. DRUMMOND** was a tech assistant in the radiology department at a hospital in the Southern District of Illinois (hereinafter the "Hospital"). **DRUMMOND** began working at the Hospital in June 2008.

4. While employed at the Hospital, **DRUMMOND** targeted elderly patients and stole their personal identifying information from hospital charts and from hospital computer records.

5. **DRUMMOND** did not have access to hospital computer records, so, instead, she would wait for other hospital employees to walk away from their computers and would then use their computers to look up patient information.

6. After collecting the necessary identifying information from patient records, **DRUMMOND** together with **SUSAN L. HARRIS** used the personal identifying information belonging to the patients to apply for credit card accounts in their victims' names.

7. The credit cards, including a GE Capital Walmart Discover Card obtained using M.D.'s personal information, were mailed to **HARRIS'S** home. **HARRIS** and **DRUMMOND** used the fraudulent credit cards to purchase items for their own benefit.

Overt Acts

8. In furtherance of the conspiracy to commit an offenses against the United States and to effect the objects of the conspiracy, one or more of the co-conspirators did various overt acts in the Southern District of Illinois and elsewhere, including, but not limited to:

- a. In or about November 2011, **DRUMMOND** obtained the personal identifying information of M.D., a patient of the Hospital.
- b. In or about November 2011, an online application was submitted for a GE Capital Walmart Discover Card using M.D.'s personal identifying information. The online application listed **HARRIS'S** home address as the

mailing address. The online application also listed **HARRIS'S** e-mail address and telephone number as the contact information.

9. On or about November 16, 2011, in Madison County and St. Clair County, Illinois, within the Southern District of Illinois, the defendants, **ASHLEY C. DRUMMOND and SUSAN L. HARRIS**, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprived, knowingly caused to be delivered by the United States Postal Service the following matter: a GE Capital Walmart Discover Card.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

Aggravated Identity Theft

10. On or about November 16, 2011, in the Southern District of Illinois,

ASHLEY C. DRUMMOND,

defendant herein, did knowingly use, without lawful authority, a means of identification, to wit: the name, date of birth and Social Security Number of another person (initials M.D.), during and in relation to the crime of Mail Fraud in violation of Title 18 United States Code, Section 1341, as charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 1028A.

COUNT 3

Aggravated Identity Theft

11. On or about November 16, 2011, in the Southern District of Illinois,

SUSAN L. HARRIS,

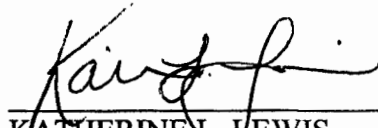
defendant herein, did knowingly use, without lawful authority, a means of identification, to wit: the name, date of birth and Social Security Number of another person (initials M.D.), during and

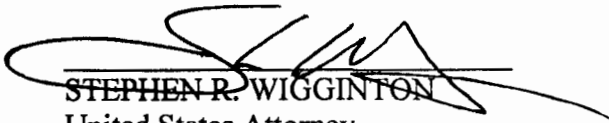
in relation to the crime of Mail Fraud in violation of Title 18 United States Code, Section 1341,
as charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 1028A.

A TRUE BILL




KATHERINE L. LEWIS
Assistant United States Attorney


STEPHEN R. WIGGINTON
United States Attorney

Recommended Bond: \$10,000 unsecured